

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF PUERTO RICO

IN RE: \* Case No.: 21-1345 (ESL)  
Fernando Amador Pares \*  
Debtor \* Chapter 13  
\*

\*\*\*\*\*

**Amended Objection to Claim**

Comes now Debtor represented by the subscribing attorney and very respectfully states, alleges and prays:

1. Secured creditor Asociacion Residentes de Lake View Estates (hence forth Asociacion) has filed secured claim number 5 for \$22989.22.
2. The claim includes charges for 2 lots that debtor owns in said subdevelopment , Lot 4-E is a vacant lot with 1027.116 metres that is next to debtors principal house located in lot E-4 A with a measurement of 1,023 meters. Both have been encumbered with a lien in favor of Asociacion.
3. The claim filed by Asociacion does not differentiate between the lots and does not identify whether the claim attaches to the main lot or the adjacent vacant lot.
4. Debtor has to know whether the claim attaches to the lot were the house which he intends to keep or whether it attaches to the vacant lot which he intends to sell.
5. The claim also includes a series of charges such as;
  - a. 9/25/09 Attorneys fee \$1374.37
  - b. 3/31/11 Asociacion Expense \$1276.25
  - c. 8/9/11 Attorneys fees \$2064.37
  - d. 2/16/12 credit \$2064.37
  - e. 3/30/12 Asociacion Expense \$1535.00
  - f. 7/17/12 lawyer fees \$2452.50
  - g. 10/3/12 credit \$2002.50 which have no basis in the contract and can not be charged to debtor.
6. Within 30 days of service any party against whom this paper has been served or any other party to the action, who objects to the relief sought, shall file an appropriate response to this objection with the Clerks office of the US Bankruptcy Court of the District of Puerto Rico. If

no objection or response is filed within the time frame, the objection will begin on opposed and may be granted; unless:

- a. A requested relief is forbidden by law;
- b. The relief is against public policy;
- c. The interest of justice requires otherwise. If you file an objection, the Court may schedule a hearing.

Wherefore debtor objects to claim #5 for lack of clarity or specificity and requests that said claim be disallowed entirely.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system which will send notification, upon information and belief, of such filing to US Trustee; to Asociacion Residentes Lake View PO box 4069 Bayamon PR 00958; to Banco Popular thru its attorney Jose J Sanchez Velez and Eduardo Veray attorney for Banco Popular Special loans and to Brenda L. ruiz PO box 648 Gurabo PR 00778.

In Carolina, Puerto Rico this Tuesday, June 22, 2021.

s/Pablo E. Garcia Perez

PABLO E. GARCIA PEREZ

USDC 207705

Ave. Roberto Clemente, Bloq.24 #58

Villa Carolina, Carolina, PR 00985

Tel/Fax: (787) 276-2750

E-Mail: abogado00985@yahoo.com